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Attorneys for Plaintiff

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 ESTEFANIA CORREA RESTREPO,
16 Plaintiff,

Case No.: 2:25-cv-00119-RFB-DJA

17 v.

~~STIPULATION AND PROPOSED~~
ORDER TO EXTEND ALL
DEADLINES

18 AMAZON.COM SERVICES LLC;
19 DOES I-X,

(THIRD REQUEST)

20 Defendant.
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23 IT IS HEREBY STIPULATED by and between Plaintiff Estefania Correa
24 Restrepo, by and through her counsel of record, Kemp & Kemp and Leon Greenberg
25 Professional Corporation, and Defendant Amazon.com Services LLC., by and through
26 its counsel of record, Littler Mendelson P.C., as follows:
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1 1. This matter was filed in state court on December 2, 2024, and Defendant
2 was served on December 18, 2024, with a copy of the Complaint and a Summons
3 issued by the state court.

4 2. On January 17, 2025, Defendant removed the action to federal court
5 based on diversity jurisdiction. ECF No. 1.

6 3. On February 28, 2025, the Court entered an Order granting the
7 Stipulated Discovery Plan and Scheduling Order submitted by the parties. ECF No.
8 10.

9 4. On July 2, 2025, the Court entered an Order extending discovery
10 deadlines. ECF 17.

11 5. On October 3, 2025, the Court entered its second Order extending
12 discovery deadlines. ECF 20.

13 6. This is the third request by the parties to extend the discovery deadlines
14 set forth in the February 28, 2025, Order. ECF No. 10.

15 7. The Parties participated in an ENE on July 1, 2025.

16 8. The parties were unable to reach a resolution at the ENE and identified
17 that further discovery would have to be conducted.

18 9. Since the ENE, Plaintiff has disclosed additional documents in support
19 of her claims, and has responded to written discovery requests.

20 10. The Parties have engaged in meet and confer sessions to address
21 outstanding discovery disputes. Defendant will file a Motion to Compel to resolve
22 unresolved discovery disputes and request this Court grant an additional extension of
23 the discovery deadlines to permit Defendant to obtain outstanding discovery prior to
24 conducting Plaintiff's deposition. In the meantime, Defendant stipulates to this sixty-
25 day extension pending the resolution of its Motion to Compel.

26 11. The parties are cooperating on scheduling depositions. Plaintiff has
27 moved out of state, and she is unable to appear for an in-person deposition prior to
28

1 the discovery cut-off deadline. Because she is unable to appear in-person for her
2 deposition prior to the deadline, the Parties have agreed upon extending the discovery
3 deadlines to allow for the scheduling of her deposition.

4 12. Plaintiff also has noticed the deposition of Defendant's Rule 30(b)(6)
5 witness(es) and additional witnesses. Defendant is coordinating the scheduling of
6 these witnesses' depositions.

7 13. In light of the need to conduct depositions, the parties believe these
8 circumstances warrant good cause for extra time to complete discovery.

9 11. The parties stipulate and agree to extend the deadline for the close of
10 discovery for sixty (60) days to allow the parties to conduct necessary depositions in
11 order to fully evaluate the claims and defenses presented and allow the Court to
12 resolve discovery disputes.

13 **A. STATEMENT OF DISCOVERY THAT HAS BEEN COMPLETED**

14 The parties have exchanged initial and supplemental disclosures of documents
15 and witnesses pursuant to FRCP 26(a)(1) and have propounded written discovery.
16 Such written discovery has been responded to by both parties. The parties have
17 engaged in meet and confer discussions relating to Defendant's written discovery.

18 **B. STATEMENT OF DISCOVERY THAT REMAINS TO BE**
19 **COMPLETED**

20 Defendant will file a Motion to Compel relating to unresolved discovery
21 disputes. Upon completion of briefing, and the Court's ruling, additional discovery
22 may be warranted. Defendant seeks to resolve these disputes prior to taking Plaintiff's
23 deposition.

24 Plaintiff will seek depositions of Defendant through Rule 30(b)(6) witness(es)
25 and will seek depositions of other individuals with knowledge of the facts at issue.
26 The parties also expect to engage in potential additional witness depositions.
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1 **C. PROPOSED SCHEDULE**

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3 The parties stipulate and agree that:

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5 1. **Discovery:** The discovery period shall be extended sixty (60) days from

6 **January 19, 2026, to March 20, 2026.**

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8 2. **Dispositive Motions:** The parties shall have through and including **April**

9 **20, 2026**, to file dispositive motions, which is 30 days after the discovery deadline.

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12 3. **Pre-Trial Order:** If no dispositive motions are filed, the Joint Pretrial

13 Order shall be filed thirty (30) days after the date set for the filing of dispositive

14 motions. In the event dispositive motions are filed, the date for filing the Joint Pretrial

15 Order shall be suspended until thirty (30) days after decision on the dispositive

16 motions or by further order of the Court.

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18 4. **Extensions or Modifications of the Discovery Plan and Scheduling**

19 **Order:** In accordance with Local Rule ²⁶⁻³~~26-4~~, a stipulation or motion for modification

20 or extension of this discovery plan and scheduling order and any deadline contained

21 herein must be made not later than twenty-one (21) days before the subject deadline.

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1 This stipulation and order is sought in good faith and not for the purpose of
2 delay.

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4 **DATED this 31st day of December 2025.**

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6 Respectfully submitted,

7 /s/ James Kemp

8 JAMES P. KEMP, ESQ.
9 KEMP & KEMP, ATTORNEYS AT
LAW

Respectfully submitted,

/s/ Amanda Breemes

Z. KATHRYN BRANSON, ESQ.
AMANDA M. BREEMES, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Defendant
AMAZON.COM SERVICES LLC

10
11 /s/ Ruthann Devereaux-Gonzalez

12 RUTHANN DEVEREAUX-
13 GONZALEZ, ESQ.
LEON GREENBERG
PROFESSIONAL CORPORATION

14 Attorneys for Plaintiff
15 ESTEFANIA CORREA RESTREPO

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18 **IT IS SO ORDERED.**

19 **Dated:** 1/5/2026

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23 **UNITED STATES MAGISTRATE JUDGE**